



Vision 360° Compliance Cockpit

March 2021

KPMG Lower Gulf Limited



Compliance framework

To help reduce the risk of non-compliance and to assist with greater adherence to the principles laid down by the ADAA and SCA, KPMG Lower Gulf has developed a tool/methodology called the Vision 360° Compliance Cockpit.

What is it?

The Vision 360° Compliance Cockpit is a web-based model which tracks event- and time-based compliances, in accordance with local and internationally recognized regulatory requirements.



A comprehensive compliance framework is necessary to ensure that all applicable laws and regulations are identified and assigned to relevant stakeholders across a range of functions and locations.

In instances of non-compliance, process owners would be well advised to take the necessary action to remediate the error.

In addition, a robust framework will allow boards' directors to have improved oversight and the opportunity to increase their awareness of incidences of non-compliance.

As an increasing number of rules and regulations are being adopted across the United Arab Emirates (UAE), it is vital that organizations are fully aware of applicable laws and legislature, in order to ensure the highest degree of compliance.

Key features

- Web-based model
- Event-based and time-based compliances
- Compliance calendar
- Dashboards
- Auto reminders
- Escalation
- Maker-checker controls
- Action tracking
- Audit trails
- Compliance certificate generation
- Ease of implementation and usage
- Works with mobile interface
- Aids litigation tracking
- Assists with adherence to statutory legal compliance
- Assists with internal control/compliances
- Generalization of circulars and notices
- Alerts include early warning signals

The Abu Dhabi Accountability Authority (ADAA) Resolution No. 1 of 2017, Securities and Commodities Authority (SCA) Resolution No. 3/Chairman of 2020, and the DIFC Regime, under Article 70(3) of the DIFC Regulatory Law 2004 and its Amendments outline compliance requirements to ensure full responsibility and accountability across the UAE.

Article 69 of Securities and Commodities Authority (SCA) Resolution No. 3/Chairman of 2020

This article outlines the roles and responsibilities of the compliance officer, including:

- oversight on the compliance function within the institution
- ensure adherence to the laws, statutory requirements, policies and procedures
- implement and review a compliance action plan

- provide guidance, counseling, training and/or educational programs to improve the facilities' understanding of relevant laws and regulatory requirements
- prepare and submit clear and brief compliance reports to the board
- communicate with regulatory bodies on compliance matters
- monitor external audits

Article 70(3) of the DIFC Regulatory Law 2004 and relevant Amendments

Under Article 70(3) of the DIFC Regulatory Law 2004, the Dubai Financial Service Authority (DFSA) has jurisdiction for the regulation of anti-money laundering (AML) in the DIFC relating to relevant persons and their officers, employees and agents. The DIFC-specific regime is contained in Chapter 2 of Part 4 of the Regulatory Law and any DFSA rules made in connection with anti-money laundering measures, policies and procedures.

DFSA's supervisory regime for AML and counter-terrorism financing (CTF) is consistent with international standards set by the Financial Action Task Force (FATF) – essential for the fight against money launderers and financiers of terrorism. More importantly, assessing the effectiveness of AML and controls established and maintained by relevant persons in DIFC forms a vital component of DFSA's ongoing risk assessment process. All regulated entities must appoint an AML officer, who has been assessed by the DFSA as fit and proper, and who is responsible for the entity's compliance with AML and CTF requirements.

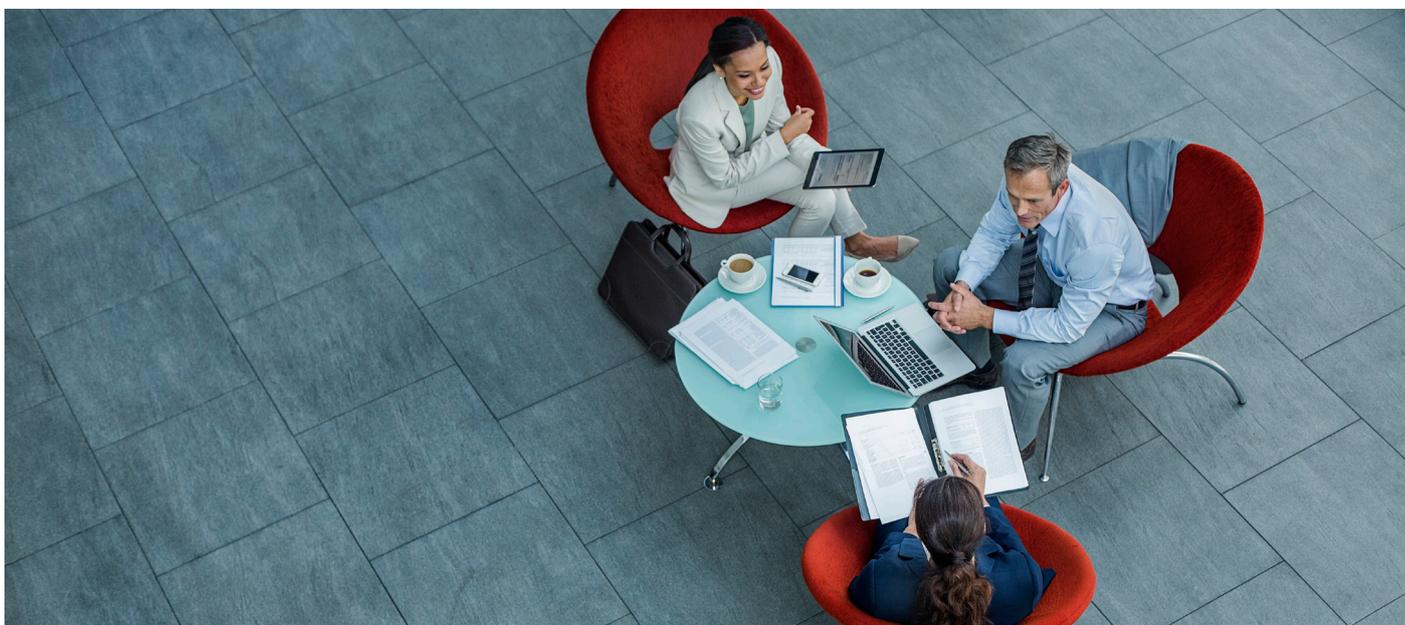
Article 5, ADAA Resolution No. 1 of 2017, of the Chairman of Abu Dhabi Accountability Authority (ADAA)

In addition to the Resolution's primary requirement, where the statutory auditor must test the effectiveness of internal controls over financial reporting and issue an opinion on its findings, the Resolution also has a quasi-legal requirement requiring the statutory auditor to verify an entity's compliance with Law Number (1) of 2017 concerning the financial system of the Government of Abu Dhabi and Department of Finance pertaining to the preparation and implementation of the annual budget as well as the law of establishment of the entity and related circulars and resolutions. The auditor must also consider the compliance of the entity with any requirements of laws, resolutions and circulars to the extent that they have an impact on the financial statements.

Non-compliance may lead to multiple risks, including but not limited to:

- Reputational risk to the company and its stakeholders
- Closure of the business
- Impact on business plans and strategies
- Fines and penalties imposed by the regulator
- Class action suit against directors and officers
- Impact to the public interest and/or stakeholders





We have developed a compliance framework with 18 key elements to assist companies in providing their board of directors with comfort that the systems and processes to monitor relevant compliances are in place.

Governance level



Operating level



Monitoring level



A. Organizational structure

Maintain integrity and independence in the compliance framework

B. Standard operating procedure (SOP)

Existence of well-defined SOPs for compliance functions

C. Roles and responsibilities

Clearly define roles and responsibilities, with segregation of duties

D. Risk assessment

Conduct periodic risk assessment and prioritize is based on results

E. Whistleblower framework

Define processes for whistleblowing, investigation and resolution

F. Reporting structure

Establish guidelines and an escalation mechanism for periodically reporting exceptions

A. Alignment of business practices

Map business requirements with applicable regulatory provisions

B. Applicable regulatory requirement

Identification of relevant acts, licenses, registrations and provisions

C. Implementation of systems and rules

Translate the compliance checklist into digital form for monitoring

D. Sourcing of the license

Timely application and renewal of the relevant license and monitor its expiry

E. Document retention

Define processes for whistleblowing, investigation and resolution

Training and awareness

Deliver periodic trainings for business personnel, compliance officers and vendors

A. MIS and reporting

Generate and report exception MIS for effective monitoring

B. Audit, inspection and site visit

Execute of periodic internal/external audits and physical inspections

C. Complaint process

Identify non-compliance incidences identified and reported

D. Self-certifications

Define processes for self-certification for key controls

E. Third party compliance

Determine a monitoring test plan for third-party vendor related compliances

F. Remedial action for non-compliance

Follow-up processes to monitor action taken



In order to implement a robust compliance framework, companies should consider the following elements:

- 01 Structured compliance framework for applicable key laws and regulations
- 02 Well defined compliance-related roles and responsibilities across locations and functions
- 03 Technology-enabled tools and databases to assist in ensuring strict compliance with relevant rules and regulations
- 04 Trainings to be regularly rolled out to employees on compliance framework requirements
- 05 A robust review and reporting mechanism

We assist clients in developing and establishing a robust compliance framework which helps provide the board of directors and other stakeholders with assurance that the company has the systems and processes to monitor relevant compliances.

How do we assist our clients?

We assist in rolling out the Vision 360° Compliance Cockpit tool and in keeping track of important dates and deadlines pertaining to work renewals or regulatory changes, by obtaining and understanding the business and compliance framework. Vision 360° can assist with centralizing data online, so processes are not affected when an employee leaves or there is a change of management. We support preparation of compliance checklists, including documents, licenses or deadlines, categorizing them according to risk parameters. We also provide support in centralizing data and documents, enabling faster analysis with more accurate data and fewer redundant files.

We also assist our clients in prioritizing key compliance framework elements and developing procedures for implementing each of these elements.

We will provide an automated web based tool which will incorporate checklists for most relevant laws and regulations.

The list of applicable laws should be assessed by the client. KPMG does not provide assurance on the completeness and comprehensiveness of all the laws and regulations.

KPMG Lower Gulf does not provide legal services. Products offered by KPMG Lower Gulf should not be considered at par with, or as a substitute for, legal advice.

We look forward to having a detailed discussion with you regarding our compliance framework. Please contact us for more information.

Contact us



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